



**IN THE UNITED STATES DISTRICT COURT FOR TENNESSEE
FOR THE MIDDLE DISTRICT
NASHVILLE DIVISION**

**DR. JAMES BAILEY,
DR. PIPPA MERIWETHER, and
DR. DAMON CATHEY,**

Plaintiffs,

v.

**THE METROPOLITAN
GOVERNMENT OF NASHVILLE AND
DAVIDSON COUNTY, TENNESSEE
AND DR. ADRIENNE BATTLE,**

Defendants.

**Case No. 3:21-cv-0122
JURY DEMAND (6)**

MOTION TO AMEND

Come the Plaintiffs, Dr. James Bailey, Dr. Pippa Meriwether, and Dr. Damon Cathey, and move this Honorable Court to allow Plaintiffs to amend their Complaint to allege violations of the Age Discrimination in Employment Act, 29 U.S.C. 621, et seq. Plaintiff Bailey received his Right to Sue letter from the EEOC on March 12, 2021, Plaintiff Meriwether received her Right to Sue letter on April 7, 2021, and Plaintiff Cathey received his Right to Sue on February 11, 2021.

The Amended Complaint also amends paragraph 131 as follows:

131. Defendants violated Tenn. Code Ann. §49-5-511(a), **Tenn. Code Ann. §49-5-512 and Tenn. Code Ann. §49-5-513**, because it ended Plaintiff Bailey's appointment without complying with any of the procedural safeguards of the Tennessee Teacher Tenure Act and without proper cause under the law. (Change in bold).